

KAUFMAN & KAHN, LLP

May 24, 2022

BY EMAIL:

Hon. Katherine Polk Failla
U.S. District Court, S.D.N.Y.
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007

Re: *United King Distribution v. Does 1-10, d/b/a Israel.tv, Israeli-tv.com and Sdarot.com* (21-cv-11024, -11025, and -11026)

Dear Judge Failla:

We are attorneys for plaintiffs in the above-captioned case. On April 26, 2022, you issued Orders for Default Judgment and Permanent Injunction in the above-referenced cases; specifically, in 11-cv-11024, Dkt. #49; in 11-cv-11025, Dkt. #49; and in 11-cv-11026, Dkt. #53 (each, an “Order”). In each of the Orders, the Court *inter alia* directed internet service providers (ISPs) as follows:

[A]ll ISPs (including without limitation those set forth in Exhibit B hereto) and any other ISPs providing services in the United States shall block access to the Website at any domain address known today (including but not limited to those set forth in Exhibit A hereto) or to be used in the future by the Defendants (“Newly-Detected Websites”) by any technological means available on the ISPs’ systems.

Plaintiffs are engaging diligently in efforts to enforce the Orders against the non-party registrars and registries set forth in Exhibit A and the service providers set forth in Exhibit C to each of the Orders. Plaintiffs hope that because of such efforts, Defendants’ streaming of pirated content that infringes upon Plaintiffs’ copyrights will be limited. As such, it might not be necessary to enforce the Orders against the ISPs.

Plaintiffs respectfully request that (a) pursuant to Fed. Rules of Civ. Pro. 59 or 60 the Court stay enforcement of the Orders against the ISPs unless and until Plaintiffs move to vacate such stay, and (b) upon Plaintiffs’ filing any such motion to vacate, such stay shall be vacated.

This is written without prejudice to any of the Plaintiffs’ rights, including but not limited to bringing a motion to lift the proposed stay or further to modify the Orders pursuant to FRCP 60(b)(5) or 60(b)(6).

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Thank you for your consideration of this matter.

Respectfully submitted,

/S/ Mark S. Kaufman

Mark S. Kaufman

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